

JASON M. FRIERSON
United States Attorney
Nevada Bar No. 7709
SUMMER A. JOHNSON
Assistant United States Attorney
CHRISTIAN R. RUIZ
Assistant United States Attorney
U.S. Attorney's Office
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Fax: (702) 388-6787
Summer.Johnson@usdoj.gov
Christian.Ruiz@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

PCPLV LLC d/b/a Pinnacle Compounding
Pharmacy, Ofir Ventura, Cecelia Ventura,
Brandon Jimenez, Robert Gomez, Gomez &
Associates, Inc., Rock'n Rob Enterprises,
Amir Shalev, D.P.M., AS Enterprises, Inc.,
and Ivan Lee Goldsmith, M.D.,

Defendants.

Case No. 2:21-cv-00184-JCM-DJA

**Stipulation to Extend the Deadlines for
the Rule 26(f) Conference, Discovery
Plan, and Scheduling Order**

(Second Request)

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, the United States requests, and Defendants Ivan Lee Goldsmith, M.D., Amir Shalev, D.P.M., and AS Enterprises, Inc., do not oppose, 15-day extensions of the due dates to hold a Rule 26(f) conference and submit a proposed discovery plan and scheduling order. The court previously granted an extension of these due dates, setting deadlines for the Rule 26(f) conference to February 26, 2024, and the filing of a proposed discovery plan and scheduling order to March 12, 2024. This requested extension would move the due dates to March 12, 2024, and March 27, 2024, respectively.

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. Further, the committee notes to the 2015

1 amendment to Federal Rule of Civil Procedure 16 recognize that in some cases, “the
 2 parties cannot prepare adequately for a meaningful Rule 26(f) conference and then a
 3 scheduling conference in the time allowed.” The committee noted that “[l]itigation
 4 involving . . . multiple parties . . . may be more likely to need extra time to establish
 5 meaningful collaboration between counsel and the people who can supply the information
 6 needed to participate [at a Rule 26(f) conference] in a useful way.”

7 Although Defendants Goldsmith, Shalev, and AS Enterprises have filed their
 8 answers, the other defendants in this case presently are at various stages of entering an
 9 appearance. Defendants Ofir Ventura, Cecelia Ventura, and Brandon Jimenez currently
 10 have a deadline of March 1, 2024, to file their answers, and Defendant Robert Gomez
 11 recently filed a stipulation to extend his respective due date until March 12, 2024.

12 The United States thus respectfully requests this extension to allow the parties
 13 sufficient time to enter their appearances, meaningfully participate in a Rule 26(f)
 14 conference, and collaborate to file a proposed discovery plan and scheduling order.

15 Respectfully submitted this 26th day of February 2024.

16 E. Brent Bryson, LTD.

JASON M. FRIERSON
 United States Attorney

17
 18 /s/ E. Brent Bryson, Esq.
 E. BRENT BRYSON, ESQ.
 Nevada Bar No. 4933
 Attorney for Defendant
 Ivan Lee Goldsmith, M.D.

/s/ Christian R. Ruiz
 CHRISTIAN R. RUIZ
 Assistant United States Attorney
 Attorneys for the United States

21 The Law Offices of Kristina
 22 Wildeveld & Associates,

23 /s/ Lisa A. Rasmussen
 LISA A. RASMUSSEN, ESQ.
 Nevada Bar No. 7491
 Counsel for Defendants Amir Shalev &
 25 AS Enterprises, Inc.

26 DATED: 2/28/2024

ORDER

IT IS SO ORDERED:


 HONORABLE DANIEL ALBREGTS
 UNITED STATES MAGISTRATE JUDGE